

Message

**From:** Schulman, Michael [Schulman.Michael@epa.gov]  
**Sent:** 8/17/2021 6:44:33 PM  
**To:** Woodlee, Jeff [Woodlee.Jeff@epa.gov]; Poalinelli, Edwin [POALINELLI.EDWIN@EPA.GOV]  
**CC:** Plate, Mathew [Plate.Mathew@epa.gov]  
**Subject:** RE: Site Visit Aug 19 (Thur): TRW Microwave Site Ladder  
**Attachments:** 2021-0816\_Microwave SWP.pdf

Hi Jeff,

What I know now is that the ladder is one story high. So about 10-12 feet high with a cage starting around 6-7 feet above ground. For context, the ladder to the roof is noted in AECOMs SWP/AHA/JSA as not needing any special AECOM training to access, which Northrup confirmed.

SITE INFORMATION AND SCOPE OF WORK	
Site Description:	The site is an occupied office building.
General Public:	Not applicable. The site walk will take place within an office building
Client or Third-Party / Contractor Operations	The client, Northrop Grumman, and USEPA will attend the site visit.
Scope of Work	The site walk will consist of meeting with USEPA and the client and looking at previous indoor air sampling locations and potentially looking a vent protrusions on the roof of the building. Access to the roof will be through permanently mounted ladders within the building. It is our understanding that the ladders have fall protection cages above 6 feet.
PRE-VISIT HAZARD IDENTIFICATION AND CONTROLS	
Identify the top hazards <i>most likely to result in serious injury or fatality</i> that may occur during the visit and discuss mitigations. Review the THAs for more detail.	
Hazard:	Mitigations:
■ Roof Access	<ul style="list-style-type: none"> <li>■ Use only permanently-mounted ladders</li> <li>■ Maintain three points of contact</li> <li>■ Wear appropriate footwear</li> <li>■ Avoid edges</li> </ul>

2. Access roof and rooftop equipment - Confirm equipment, scaffold/ladder, and aerial lift inspections have been completed	3a. Falls from ladders, stairs	15	3a. Use 3-points of contact to climb ladders or stairways. Do not carry materials or equipment in your hands – use a backpack or satchel. Fixed industrial ladders greater than 20 feet in height require special fall protection equipment beyond cages – consult with your SH&E manager before using cable climbing equipment. If using roof hatch to access rooftop, ensure ladder has an extension or other grab bar to provide handhold at least 3 feet above the roof surface. Immediately move away from edges or parapets.	5
	3b. Falls from roof edges or changes in elevation (roof levels)	15	3b. Employees relying on fall protection barriers must have completed Fall Protection prior to accessing elevated work areas. If using elements of personal fall arrest or fall restraint devices, employees must have completed Fall Protection and Authorized User training prior to accessing elevated work areas. Remain behind edge protection barriers or guardrails. Do not lean or step onto barriers or guardrails.	6
	3c. Falls through skylights or other roof openings	15	3c. Identify and avoid unprotected skylights and roof openings. If work area requires close access to unprotected skylights or roof openings, create visual barriers (caution tape/cones or post a monitor at the hazard area to protect from accidental approach.	5

Michael

**From:** Woodlee, Jeff <Woodlee.Jeff@epa.gov>  
**Sent:** Tuesday, August 17, 2021 11:38 AM  
**To:** Schulman, Michael <Schulman.Michael@epa.gov>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>

**Cc:** Plate, Mathew <Plate.Mathew@epa.gov>

**Subject:** RE: Site Visit Aug 19 (Thur): TRW Microwave Site Ladder

Hi Michael,

Depends on the ladder configuration. How high does the cage begin? How tall is the entire ladder climbing length?

Jeff

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**From:** Schulman, Michael <Schulman.Michael@epa.gov>

**Sent:** Monday, August 16, 2021 11:47 AM

**To:** Woodlee, Jeff <Woodlee.Jeff@epa.gov>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>

**Cc:** Plate, Mathew <Plate.Mathew@epa.gov>

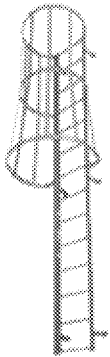
**Subject:** Site Visit Aug 19 (Thur): TRW Microwave Site Ladder

Hi Jeff,

For the TRW Microwave Site visit this Thursday, EPA wants to inspect the vapor intrusion mitigation vent stacks, which are on the roof. Matt Plate has had ladder training and is a competent person to do this work. However, for me, can I access the roof? If Matt inspects the ladder as in good condition, does the cage around the ladder meet EPA and/or OSHA requirements for me to use the ladder? Below is more information on the ladder:

“Based on his recollection, both ladders were inside the building and were both well over 6 feet. They are attached vertically to the wall with a metal cage to “crawl” through starting around 6-7 feet from ground.”

Something like this:



Thank you.

Michael

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**From:** Kurt Batsel <batsel@dextra-group.com>

**Sent:** Thursday, August 12, 2021 7:57 AM

**To:** Schulman, Michael <Schulman.Michael@epa.gov>

**Subject:** TRW Microwave Follow-up

Hi, Michael – As a follow-up to our conversation yesterday, I have attached some info on the ladder that goes to the roof to access the roof vents at the Apple building. AECOM is also preparing a site inspection safety plan and will have that to me on Friday. I will forward it as soon as I receive it. <<snip>>

**Kurt R. Batsel, P.E.** | The Dextra Group, Inc.

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